

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

C.A. No.:

DECLARATION OF DR GREGORY F. BALL

Pursuant to 28 U.S.C. § 1746, I, Dr. Gregory Ball, hereby declare as follows:

1. I am the Vice President for Research at the University of Maryland, College Park (“UMCP”), a constituent institution of the University System of Maryland (“USM”), the State of Maryland’s public system of higher education. This is a position I have held since 2020. Prior to holding this position, I was Dean of the College of Behavioral and Social Sciences at UMCP, a position I held for 8 years.

2. UMCP is the State of Maryland’s flagship research university and is ranked by *Forbes* as #12 in the United States among public universities. UMCP enrolls over 40,000 students across twelve schools and colleges and an interdisciplinary Graduate School and offers over 300 degree programs. UMCP is a global leader in numerous areas of study, including mathematics, computer science, health, data science, climate science, and more. UMCP, along with its sister institution the University of Maryland, Baltimore (“UMB”), engages in cross-cutting research that highlights the intersection of engineering, computer science, AI, and medicine. UMCP faculty and

students are involved in a broad range of scientific endeavors and research centers whose focus spans from the cellular to the societal. Libraries are frontline and trusted resources in times of change such as the COVID-19 pandemic and record-breaking migration. UMCP has become a leader in providing critical training for libraries that are responding to various nationwide challenges.

3. In my position, I am responsible for a joint research enterprise that ranks among the top public institutions in research expenditures and which garners \$1.2 billion in research awards annually.

4. I have personal knowledge of all the facts stated herein or have knowledge of the matters based on my review of information and records gathered by my staff including campus research administrators, deans, and numerous faculty members who serve as Principal Investigators (PIs) on various IMLS awards.

5. I submit this declaration in connection with Executive Order 14,238, “Continuing the Reduction of the Federal Bureaucracy,” which directed seven federal agencies, including the Institute of Museum and Library Services (“IMLS”), to eliminate any non-statutory components and functions to the maximum extent consistent with applicable law, and to reduce the performance of any statutory functions and associate personnel to the minimum presence and function required by law.

6. Given my experience, I believe that Executive Order 14,238 will cause IMLS to be unable to administer financial awards and/or programs on which UMCP relies and on which it expects to rely in the future, causing significant harm to the State of Maryland and UMCP.

7. In 2024, IMLS invested \$180 million in libraries across the United States under its Grants to States Program. The State of Maryland received \$3,332,465.00 which represents the 66-

percent Federal share of the activities in the approved Five-Year Plan under the Library Services and Technology Act, 20 U.S.C. § 9134.¹

8. UMCP uses its portion of these federal funds to support many of its programs, as evidenced below. Losing these funds would greatly impact the various colleges, researchers, faculty, staff, and students as demonstrated by the individual impact statements from various UMCP stakeholders below.

The Institute of Museum and Library Services' Impact on UMCP's College of Information

9. With groundbreaking research and innovative academic programs, UMCP's College of Information strengthens information institutions, fosters responsible information use, increases information reliability, and ensures equitable access to information. The College of Information—in particular, its highly-ranked Library and Information Science Program—relies on IMLS funding to harness data and technology for social, economic, and environmental good.

10. In the current fiscal year, the College of Information has \$2,225,641.09 in active IMLS awards. Of this total, \$1,387,785.62 has been expensed as of December 31, 2024, yielding an approximate balance of \$837,855.47. Additionally, the college has \$298,789.07 in new proposals currently under review at IMLS. The latter two figures are in jeopardy with any stop-work order (none has been received to date).

11. The College of Information uses these federal funds to support many of its programs, including conducting cutting-edge information science research, presenting that research at scholarly venues, creating new software tools and techniques, developing curricula, running community workshops, orchestrating national webinars, and publishing free-to-access

¹ A chart showing the 2024 allotments can be accessed here:
<https://www.imls.gov/sites/default/files/2024-04/imslstastateallotmenttablefy2024.pdf>.

guides for the general public. IMLS funds currently support faculty summer salaries and enable the employment of 15 graduate student research assistants for an average of 2.1 years (with a range of 1 to 4 years), 2 IMLS doctoral fellows (2 years each), and 3 graduate and 2 undergraduate hourly research assistants for 1 to 4 years.

12. The College of Information's budget for this year is dependent on receiving the full amount of these awards and the College has made plans and allocated funding for staffing based on the anticipated receipt of Federal funding promised. This includes cost-sharing commitments by the College on most of the funded projects.

13. Any pause in the College's federal funding would stall the progress of the research and curriculum development, jeopardize critical partnerships, cancel key public educational events, and bring employment uncertainty to all non-faculty working on the projects, as the College has no means of covering for any lost funds.

14. Most of these funded projects involve extensive networks of partners and collaborators across the region, the State of Maryland, the nation, and abroad. After direct funding of personnel employed on the projects, compensating partners is the second highest expense. Most provide services with the expectation of being reimbursed by UMCP, which in turn expects reimbursement by IMLS. For many non-profit partners, these financial outlays can be significant, but they are willing to take the risk given the stability of their relationship with UMCP and IMLS. Breaching this trust through non-payment could set these key relationships back years and cause irreparable harm.

15. If the College of Information does not receive such disbursements/reimbursements, it will not be able to cover any expenses listed in the grant budget that occur after the date of the

“stop work” orders. This includes salaries, honorariums, supplies and expenses related to the College’s various projects.

The Institute of Museum and Library Services’ Impact on the David C. Driskell Center

16. The David C. Driskell Center located on UMCP’s campus is a creative incubator dedicated to a world where Black artists exist at its center. Through programs, exhibitions, and scholarship, the Driskell Center actively engages with the richness and diversity of Black artistic expressions and promotes a more inclusive and equitable artistic landscape.

17. In July 2024, the Driskell Center received an IMLS grant entitled *From Canvas to Community: Unlocking the African American Art Archive* (the “Canvas to Community Grant”), in the amount of \$289,223.00. The PI of this Grant is responsible for overseeing the implementation of the archival development project, including the planning, staffing, infrastructure enhancement, and community outreach necessary to ensure broad public access to these materials.

18. The Canvas to Community Grant allows the Driskell Center to begin processing, preserving, and making publicly available archival materials from its collections that document critical chapters in American cultural history.

19. The Driskell Center also uses the Canvas to Community Grant to pay the salaries of two employees and two students.

20. The Driskell Center plans to seek continued funding from IMLS to support the expansion and long-term sustainability of its archival program. Building on the momentum of the current project, the Driskell Center anticipates future applications that will support digitization, community-access initiatives, preservation of audiovisual materials, and professional development for staff and student workers. These efforts are central to our mission of making American cultural materials accessible to the public and to researchers. IMLS funding is critical to advancing this

work and to ensuring that these historically significant materials are preserved and made available to future generations.

21. Any pause in our federal funding would significantly delay the processing and accessibility of archival collections, halt planned hires of essential staff, and limit public and scholarly engagement with materials that document histories in American art.

22. The uncertainty around potential reimbursement has already introduced hesitation in advancing key aspects of the project, including the onboarding of temporary staff, contracting vendors for digitization services, and initiating public programming. This chilling effect disrupts momentum, limits the Driskell Center's ability to commit to timelines, and compromises our ability to deliver the archival access and educational services promised in the original grant proposal.

23. The Driskell Center has a strong track record of timely reporting and compliance with federal grant requirements and has received consistent positive feedback from IMLS regarding its administration and performance. The uncertainty introduced by this Executive Order threatens to chill planning for future initiatives, limit innovation, and discourage collaboration with public-serving institutions.

24. The Grant funds have been disbursed but have not yet been completely exhausted, as they are being drawn down incrementally in accordance with the project timeline and approved budget.

25. The Driskell Center has committed its own institutional funding as a 30% cost share to support this work. If the federal portion of the award is not reimbursed or fully utilized, the Center will face serious financial strain, potentially forcing it to scale back or suspend key components of the project, including staffing, digitization, and public access efforts that are critical to its success.

The Institute of Museum and Library Services' Impact on the CDAAA Project.

26. In September 2022, UMCP was awarded a Laura Bush 21st Century Librarian Early Career three-year research grant from the IMLS entitled *Crowdsourced Data: Accuracy, Accessibility, Authority* (CDAAA Grant). This Grant was awarded in the amount of \$458,151.00 with a period of performance through August 2025.

27. The PI for the CDAAA Grant at the College of Information is responsible for executing the planned research activities, which include recruiting and interviewing members of the Library, Archive, and Museum (LAM) community who conducted crowdsourced text transcription projects between 2017 and 2024, as well as blind and low-vision members of the public who tested the usability and accessibility of resulting transcriptions. LAM Partners took part in semi-structured interviews and technical demonstrations of their content management systems, while blind and low vision users took part in a structured usability and accessibility test codesigned by the PI and her doctoral student, an assistant research scientist. The PI is ultimately responsible for meeting the grant objectives and has communicated progress in annually scheduled reports to the IMLS through the .eGOV system.

28. The CDAAA Grant, under the direction of the PI, employs a doctoral candidate for 20 hours per week, 12 months per year, along with fringe benefits and tuition, and in year two of the grant employed an assistant research scientist for 15% of their time. The Grant has provided course releases and summer salary for the PI, as well as funds to cover the cost of conference participation and publication in open access journals where the research can reach the largest audience at no direct cost.

29. Any pause in federal funding would harm the work of the PI's doctoral student, who is undertaking time-sensitive research and analysis of the CDAAA data collection as planned

in the original grant application. The student is in the final year of their dissertation research and needs to spend the maximum number of hours writing and analyzing the data for their work. A loss of funding would require the student to undertake 20 hours of teaching work as part of their contract at the University of Maryland and could derail their degree progress and professional development. Furthermore, a loss of funding would impede the PI and her team as they attempt to disseminate findings—including best practices for making transcriptions accessible for people with print disabilities—to LAMs in a timely manner.

30. Already, the PI and her team cancelled one public talk about their research outcomes following the President’s signing of Executive Order 14,151 that targeted “DEI, DEIA, or ‘environmental justice’ programs.” By threatening to derail federal support from the IMLS, the current executive order only compounds those chilling effects and sows confusion and reticence across the cultural heritage and academic research sectors.

The Institute of Museum and Library Services’ Impact on the Hatchlings Project

31. In August 2024, UMCP was awarded a \$249,999 IMLS grant for a project entitled *The Hatchlings Project: Community-Library Partnerships to Reduce Childhood Literacy Inequities* (the “Hatchlings Grant”). The Hatchlings Grant supports efforts to empower underserved new parents to engage their babies in early language and literacy building activities both in and out of the library. The ultimate goal is to create a sustainable asset-based program for improving children’s literacy and academic outcomes, starting from birth. This project fulfills IMLS’s goal to champion lifelong learning by advancing shared knowledge and learning opportunities for all, and meets a national, persistent need to improve children’s literacy development. It additionally contributes to building the workforce and institutional capacity for managing the national information structure and serving the information and education needs of

the public. All products and deliverables of the project will be made freely and openly available to the public and libraries across the United States.

32. UMCP uses the Hatchlings Grant to pay the full salary of a graduate student researcher for two years and to provide partial salary support for five more employees (four research faculty and one consultant, the program developer). The funded 3-phase project critically depends on the Hatchlings Grant and could not continue without the committed funds.

33. Any pause in federal funding would require the research project to close immediately. This would bar libraries and the public from accessing the curriculum being developed. The graduate student researcher would have to be laid off, since there are no other funds to support her. The research faculty would lose part of their salaries. Finally, it would waste the funds already spent, since no project results or deliverables will be able to be produced.

34. The PI for this Grant has received more than \$2 million in federal funding over her career, primarily from the National Institutes of Health and, more recently, the IMLS. She has a perfect record of submitting comprehensive and timely project reports. Her work has resulted in nearly one hundred publications and presentations to disseminate findings and ultimately has improved the lives of thousands of children and families. The Hatchlings Grant discussed here received a perfect score from external reviewers, indicating that it was of the highest priority. The PI will submit the first interim project report in August 2025, where she will describe the project's successes so far.

35. In the next 2.5 years, UMCP is scheduled to receive disbursements/reimbursements of all \$249,999 under this Federal awards. At present, the full award amount has been disbursed but less than \$50,000 is spent down, as it is intended to be spent across all 3 years.

The Institute of Museum and Library Services' Impact on the LINA Project

36. In August 2022, UMCP was awarded a \$390,308 IMLS grant for a project titled “Libraries, Integration, and New Americans” (the “LINA Grant”). The primary purpose of the LINA Grant is to co-create professional development training alongside librarians to strengthen library service to immigrant and refugee communities. This three-year early career grant project aims to use evidence-based insight on immigrant acculturation to assist libraries in responding to a changing immigration landscape.

37. This Grant supports librarian professional development and further community partnerships, with the deliverables including a free, self-paced mini-course for library staff, a curriculum on Immigration & Information; and a workbook for immigrant groups. The purpose is to advance library information science knowledge of immigrant wellbeing and increase capacity for libraries to serve as trusted spaces.

38. The LINA Grant also pays the salaries of two researchers.

39. The LINA Grant aligns with the Institute of Museum and Library Services’ mission of understanding on a national level the conditions under which libraries improve the quality of life of communities across the United States. This project fulfills IMLS’s charge to explore not just the material standard of living but cultural plurality, civic engagement, and social connections.

40. A pause in this Grant would cause disruption in the dissemination of vital community services and partnerships. This project team has connected with over 300 library workers across the United States. Currently, 135 library workers are matriculating through the Improving Library Partnerships with Immigrants course offered by UMCP, which has become a leader in furthering immigrant information access.

41. Dismantling IMLS and ending the LINA Grant would effectively destabilize library outreach in many realms. As it relates to immigrant services, libraries of all kinds—particularly school, public, and academic libraries—assist with preventing information fraud, improving

digital skills, furthering workforce readiness, providing families with educational and recreational pursuits, and offering access to e-government services such as immigration and naturalization procedures. The work supported by the LINA Grant reflects more than one hundred years of library outreach to immigrants, and many of the staple services that libraries are recognized for today—for example, children’s storytime, language learning, and job preparation—emanate directly from longstanding library programs with and for immigrants.

42. This project was scheduled to receive several thousands of dollars in reimbursements for expenses incurred administering this award and conducting this critical research. If we do not receive such disbursements/reimbursements, the UMCP will be unable to compensate staff, vendors, and community members and provide vital training in a time of unprecedented immigration policy changes impacting rapid library response.

43. Any resulting delay from the dismantling of IMLS would hinder the work supported by the LINA Grant in a time in which libraries are relying on and immigrant communities are benefiting from evidence-based, research-driven training and professional development.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on April 2, 2025, in College Park, Maryland.

A handwritten signature in blue ink, reading "Gregory F. Ball", is positioned above a horizontal line.

Dr. Gregory F. Ball